

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK I. SOKOLOW, *et al.*,

Plaintiffs,

vs.

THE PALESTINE LIBERATION  
ORGANIZATION, *et al.*,

Defendants.

No. 04 Civ. 00397 (GBD) (RLE)

**DECLARATION OF EITAN ARUSY**

I, Eitan Arusy, of Ra'anana, Israel, declare pursuant to 28 U.S.C. § 1746, as follows:

**Background**

1. I am currently the CEO of Netzah Oz Consulting Ltd. I have extensive experience in cross-border international fraud investigations, financial crimes enforcement, sanctions enforcement, anti-money laundering investigations and terrorism financing investigations. I have worked closely with the intelligence and law enforcement communities in the U.S., Europe, and the Middle East on these matters, advising governments, major international law firms, multinational corporations, and high net worth individuals from all over the globe.

2. From 2005 through 2007, I served in the office of the New York County District Attorney's Office (DANY), where I was the Intelligence Analyst for Investigation Division Central Bureau. In this capacity, I led investigations targeting terrorism financing, money laundering, and international banking frauds. During my tenure at DANY, I worked with U.S. federal law enforcement and intelligence agencies, as well as with foreign governments, and was

an expert witness in several landmark cases for the Government.

3. Prior to my position with DANY, I served as an Intelligence Officer with the Israeli Defense Forces (IDF), retiring as a Major. In this role, I was responsible for collecting and analyzing intelligence material including terrorism financing and money laundering.

4. I am fluent in English, Arabic, and Hebrew.

5. A complete copy of my curriculum vitae is attached hereto as Exhibit A.

6. I was hired by Arnold and Porter LLP to investigate and provide information regarding the assets of the PLO. In the course of my professional career, I have had occasion to learn about the financial structure and assets of the PLO. I also used several investigative measures, including human source inquiries and open sources research, in order to obtain additional, current details of certain of the PLO's assets.

7. In this Declaration, I focus on a single, but significant, PLO asset: **The Al-Sanabel Trading and Investment Company Ltd.** ("Sanabel"). My focus on Sanabel does not imply that the PLO has no other assets. To the contrary, the PLO does in fact have additional undisclosed assets, in respect to which my investigation continues.

### **Findings**

8. In the 1970s, the PLO established two commercial companies, named Samed and Al-Sachra, to hold and manage the PLO's assets and investments. At one time, Samed alone held PLO assets of over a billion dollars.

9. On February 17, 2009, the PLO registered a new company, "Al-Sanabel Trading and Investment Company Ltd." in the Palestinian Authority's company registrar ("Sanabel"). Sanabel was incorporated as a private limited liability shareholding company with a share capital of US \$50,000,000, and assigned registration number 562482216. A true copy of Sanabel's

updated registration certificate, dated February 22, 2011, is attached hereto as Exhibit B.

10. According to the official registration certificate of Sanabel, its shareholders are four senior officials of the PLO, PA, and/or Fatah:

- a. **Mahmoud Abbas**—the Chairman of the PLO and the PA.
- b. **Mo'in ("Ramzi") Khoury**—the Director-General of the PLO's Treasury, known as the Palestinian National Fund (PNF).
- c. **Mostafa Abu Al-Rub**—the Financial Advisor to Mahmoud Abbas.
- d. **Mohammad Shtayyeh**—currently a member of the Fatah Central Committee, who has served in numerous official positions in the PLO and PA.

11. On August 4, 2009, at the Sixth Fatah Convention, Fatah and PLO leadership decided to transfer the assets held by Samed and Al-Sachrah into Sanabel. Thus, Sanabel succeeded Samed and Al-Sachrah, and obtained the PLO assets previously held by those entities.

12. According to confidential sources, Sanabel's core business is the promotion of Palestinian commercial and industrial projects inside and outside the PA. Sanabel owns real estate inside the PA territories, as well as in East Jerusalem, and even in the heart of Israel—Jerusalem, Jaffa, Acre, and Haifa.

13. Outside the PA territories, Sanabel holds all of the PLO's assets formerly held by Samed, estimated to be worth \$150,000,000 USD. Sanabel owns 26 different factories.

14. Sanabel maintains strategic economic relationship with the Central African Republic (CAR). One of Sanabel's agricultural subsidiaries (name unknown) is distributing Bananas from CAR to Europe with revenue stream of hundreds of millions of USD annually. I do not have full details on this company at this point.

15. Confidential sources have reported to me that Sanabel also owns real estate in the following countries: France, Bulgaria, Czech Republic, Switzerland, and the UK. As for the UK

assets, I am informed that an office building in London is owned by a Palestinian residing in Jerusalem named Adnan Jumaa Kirsh and that this individual is actually a nominee on behalf of Fatah/Sanabel. Kirsh resides in Beit Hanina in Jerusalem; he is a car importer of Opel and other brands into the PA. His son, Safwat Adnan Kirsh resides in London.

16. Inside the PA areas, Sanabel is invested at least in the following ventures:
  - a. Sanabel owns 17% of the Palestinian Stock Exchange (PSE).
  - b. Sanabel owns 43.81% of the Palestine Insurance Company (PICO).
  - c. Sanabel owns 7.95% of the Palestinian distribution company Wassel Group (a/k/a The Palestinian Company for Distribution and Logistics), traded at the PSE ([www.wasselgroup.ps](http://www.wasselgroup.ps)).
  - d. Sanabel owns agriculture projects and industrial factories (packaging and canned goods factories) in the Jordan valley and the Northern West Bank, such as the Jericho Agro-Industrial Park implemented by the Palestinian Investment Fund (PIF) through Ammar Group in partnership with PRICO and Sanabel.
  - e. Sanabel has a wholly-owned agriculture subsidiary named Al-Sanabel Company for Agricultural and Veterinarian Investment—see their Facebook page <https://www.facebook.com/AL.Sanabel.Company>

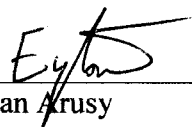
17. According to confidential sources, Sanabel has a significant amount of liquid assets, estimated to be around \$200 million USD. The sources identified two banks in the Palestinian territories where Sanabel conducts its banking—The Palestine Investment Bank (PIB) and the Bank of Palestine.

18. In my work on this task, I observed that Palestinian officials appeared to be trying

to hide the identity and ownership of Sanabel and keep it secret. PLO officials were very hostile when asked about Sanabel's business and assets.

19. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed at Tel Aviv, Israel  
July 9, 2015

  
Eitan Arusy